

# Fact Sheet



## For Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 19, 2018.

Permit Number: **R30-05700003-2018**

Application Received: **09/12/2019**

Plant Identification Number: **03-54-057-00003**

Permittee: **Kingsford Manufacturing Company**

Facility Name: **Beryl Plant**

Mailing Address: **180 Kingsford Lane, Parsons, WV 26287**

Permit Action Number: MM01      Revised: 03/17/2020

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|--------------------|--|
| Physical Location: | 3798 Beryl Road, Piedmont, Mineral County, West Virginia   |
| UTM Coordinates:   | 666.0 km Easting • 4371.0 km Northing • Zone 17  |
| Directions:        | The Facility is located adjacent to WV Route 46 in Mineral County near the WV - Maryland border just west of the town of Luke, MD. |

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### Facility Description

The purpose of this modification is to modify the way in which wood chips/bark are brought on site. Previously they were received from a conveyor belt that was owned and operated by the neighboring papermill. The papermill has now shut down and this modification is being done to change from conveyor fed wood piles to having a wood chip (hogfuel) truck receipt system. This modification was approved under R13-2117F.

### Emissions Summary

The emission of PM<sub>10</sub> has increased by 0.14 TPY due to this modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 209 TPY of NO<sub>x</sub> and 112 TPY of PM<sub>10</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Kingsford Manufacturing Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

|                    |         |   |
|--------------------|---------|---|
| Federal and State: | 45CSR13 | Construction permit requirement                     |
|                    | 45CSR7  | Particulate emissions from manufacturing operations |
|                    | 45CSR30 | Operating permit requirement.                       |

State Only: N/A

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

The active permits/consent orders associated with this modification are:

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> ) |
|--------------------------------|------------------|--|
| R13-2117F                      | 10/18/2019       |  |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

This modification changes the way in which wood bark is brought into the facility. It was previously received from a conveyor that was owned and operated by the next door papermill, but the papermill has been shut down. This modification replaces the previous method with a wood chip (hogfuel) truck receipt system.

The updates to the Title V permit as a result of this modification are as follows:

- Table 1.2 was updated, as R13-2117F supersedes and replaces R13-2117E.
- Section 3.2.1 was changed to "Reserved" to reflect the change within R13-2117F.

- The Emission Units Table was updated with the year the wood pile management areas were modified.
- The new wood chip (hogfuel) truck receipt system was added to the Emission Units Table under Emission Unit ID 001-03 to follow the numbering convention of the current table.
- The hogfuel truck receipt system is subject to 45CSR7 sections 5.1 and 5.2, which are already covered in permit conditions 3.1.13, 3.1.14, and section 7.0. The permittee will be required to maintain records indicating the use of any dust suppressants or any other suitable dust control measures in accordance with condition 7.4.1.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

### **Request for Variances or Alternatives**

N/A

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: N/A  
Ending Date: N/A

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Nikki B. Moats  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478  
Nikki.B.Moats@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.